

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Memorandum of Law in Opposition to Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Motion to Exclude Plaintiffs' Experts' Asbestos-Related Opinions.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Deposition of Susan Nicholson, J&J's Rule 30(b)(6) corporate representative, taken July 26, 2018.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of Mark Krekeler, Ph.D., dated November 16, 2018. (*filed under seal*)

5. Attached hereto as Exhibit 3 is a true and correct copy of the Amended Rule 26 Expert Report of Robert B. Cook, Ph.D., dated January 22, 2019. (*filed under seal*)

6. Attached hereto as Exhibit 4 is a true and correct copy of IMERYS 077321. (*filed under seal*)

7. Attached hereto as Exhibit 5 is a true and correct copy of IMERYS 334779. (*filed under seal*)

8. Attached hereto as Exhibit 6 is a true and correct copy of IMERYS 117598. (*filed under seal*)

9. Attached hereto as Exhibit 7 is a true and correct copy of the International Agency for Research on Cancer, IARC Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Humans, Volume 100C: Arsenic, Metals, Fibres, and Dusts, Lyon, France, 2012.

10. Attached hereto as Exhibit 8 is a true and correct copy of Van Gosen BS, Lowers HA, Sutley SJ, Gent CA, *Using the geologic setting of talc deposits as an indicator of amphibole asbestos content*, Environmental Geology (2004) 45(7):920-939.

11. Attached hereto as Exhibit 9 is a true and correct copy of Virta, Robert L, *The Phase Relationship of Talc and Amphiboles in a Fibrous Talc Sample*, Bureau of Mines Report of Investigations (1985).

12. Attached hereto as Exhibit 10 is a true and correct copy of IMERYS 245144. (*filed under seal*)

13. Attached hereto as Exhibit 11 is a true and correct copy of IMERYS 467511. (*filed under seal*)

14. Attached hereto as Exhibit 12 is a true and correct copy of IMERYS-A_0024548. (*filed under seal*)

15. Attached hereto as Exhibit 13 is a true and correct copy of JNJ 000521616. (*filed under seal*)

16. Attached hereto as Exhibit 14 is a true and correct copy of JNJAZ55_000006341. (*filed under seal*)

17. Attached hereto as Exhibit 15 is a true and correct copy of JNJMX68_000017827. (*filed under seal*)

18. Attached hereto as Exhibit 16 is a true and correct copy of WCD_002478. (*filed under seal*)

19. Attached hereto as Exhibit 17 is a true and correct copy of Marconi A, Verdel U. 1990. Asbestos content of talcs from Italian mines and fibre concentration in various commercial talcum powders used in Italy. In: Bignon J. (eds) Health

Related Effects of Phyllosilicates. NATO ASI Series (Series G: Ecological Sciences), Vol. 21. Springer, Berlin, Heidelberg.

20. Attached hereto as Exhibit 18 is a true and correct copy of the Deposition of Mr. Patrick Downey, taken on August 7, 2018.

21. Attached hereto as Exhibit 19 is a true and correct copy of Chidester AH, Billings MP, and Cady WM. 1951. Talc Investigations in Vermont-Preliminary Report. U.S. Geological Survey Circular, Series No. 95.

22. Attached hereto as Exhibit 20 is a true and correct copy of Ratté Charles A. 1982. Mineral Resource Provinces of Vermont. Vermont Geological Survey, DEC.

23. Attached hereto as Exhibit 21 is a true and correct copy of Bain GW. 1934. Serpentinization, origin of certain asbestos, talc and soapstone deposits. *Economic Geology*. 29(4):397-400.

24. Attached hereto as Exhibit 22 is a true and correct copy of Bain GW. 1942. Vermont talc and asbestos deposits. In Newhouse, W. H., ed., Ore deposits as related to structural features. Princeton University Press, 255 – 258.

25. Attached hereto as Exhibit 23 is a true and correct copy of Blount, AM. 1991. Amphibole Content of Cosmetic and Pharmaceutical Talcs. *Environmental Health Perspectives*. 94:225-230.

26. Attached hereto as Exhibit 24 is a true and correct copy of J&J 220.

(filed under seal)

27. Attached hereto as Exhibit 25 is a true and correct copy of the Deposition of Alice M. Blount, Ph.D., *Ingham v. Johnson & Johnson, et al.*, taken April 13, 2018.

28. Attached hereto as Exhibit 26 is a true and correct copy of relevant excerpts from the International Agency for Research on Cancer (IARC) Monograph on Silica and Some Silicates (1987).

29. Attached hereto as Exhibit 27 is a true and correct copy of relevant excerpts from the International Agency for Research on Cancer (IARC) Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs Volumes 1 to 42, Supplement (1987).

30. Attached hereto as Exhibit 28 is a true and correct copy of relevant excerpts from the International Agency for Research on Cancer (IARC) Monograph on Carbon Black, Titanium Dioxide, and Talc, Volume 93 (2010).

31. Attached hereto as Exhibit 29 is a true and correct copy of Chidester, AH. 1968. Evolution of the Ultramafic Complexes of Northeastern New England: Studies in Appalachian Geology, Chapter 26, John Wiley Interscience Publishers, New York.

32. Attached hereto as Exhibit 30 is a true and correct copy of Ross M, Smith WL, and Ashton WH. 1968. Triclinic Talc and Associated Amphiboles from Gouverneur Mining District, New York. *The American Mineralogist*. 53(5-6):751-769.

33. Attached hereto as Exhibi 31 is a true and correct copy of Stemple IS, Brindley GW. 1960. A Structural Study of Talc and Talc-Tremolite Relations. *Journal of the American Ceramic Society*. Vol. 43, No. 1.

34. Attached hereto as Exhibit 32 is a true and correct copy of Li, Yuya. 1979. Discussion on the Genesis of Longsheng Talc Mine in Guangxi Province. China National Exploration Center of Building Materials Industry, Guangxi Geological Team. (English translation of original Chinese publication).

35. Attached hereto as Exhibit 33 is a true and correct copy of Exhibit 28 to the Deposition of John Hopkins, Ph.D., taken August 16, 2018.

36. Attached hereto as Exhibit 34 is a true and correct copy of J&J 2. (*filed under seal*)

37. Attached hereto as Exhibit 35 is a true and correct copy of JNJ 000245002. (*filed under seal*)

38. Attached hereto as Exhibit 36 is a true and correct copy of IMERYS 425354. (*filed under seal*)

39. Attached hereto as Exhibit 37 is a true and correct copy of IMERYYS
238270. *(filed under seal)*

40. Attached hereto as Exhibit 38 is a true and correct copy of IMERYYS
435992. *(filed under seal)*

41. Attached hereto as Exhibit 39 is a true and correct copy of IMERYYS
427291. *(filed under seal)*

42. Attached hereto as Exhibit 40 is a true and correct copy of IMERYYS
219720. *(filed under seal)*

43. Attached hereto as Exhibit 41 is a true and correct copy of
JNJMX68_000017515, memorandum authored by J&J employee A. J. Goudie,
dated January 3, 1974. *(filed under seal)*

44. Attached hereto as Exhibit 42 is a true and correct copy of
JNJNL61_000106449 (“D-7131”), CTFA Method J-41, dated October 7, 1976.
(filed under seal)

45. Attached hereto as Exhibit 43 is a true and correct copy of the
Transcript of Deposition of Donald Hicks, J&J Rule 30(b)(6) corporate
representative, taken June 28, 2018.

46. Attached hereto as Exhibit 44 is a true and correct copy of the
Transcript of Deposition of Julie Pier, Imerys Rule 30(b)(6) corporate representative,
taken September 13, 2018.

47. Attached hereto as Exhibit 45 is a true and correct copy of the trial testimony of John Hopkins, J&J corporate representative, in *Ingham, et al. v. Johnson & Johnson, et al.*, Trial 5326, dated June 6, 2018.

48. Attached hereto as Exhibit 46 is a true and correct copy of J&J-309, J&J-310, J&J-1, and J&J-311. (*filed under seal*)

49. Attached hereto as Exhibit 47 is a true and correct copy of J&J-313. (*filed under seal*)

50. Attached hereto as Exhibit 48 is a true and correct copy of J&J-9; J&J-257; J&J-255; J&J-256; J&J-15; J&J-19; J&J-23; J&J-28; J&J-342; J&J-373; J&J-29; J&J-348; D-7; J&J-36, J&J-34, J&J-37; J&J-263; J&J-33; J&J-100; J&J-296; J&J-44; J&J-335; J&J-367; J&J-368; J&J-47; J&J-299; J&J-258; J&J-263; J&J-57; J&J-58; J&J-65; J&J-66; J&J-366; J&J-370; J&J-74; J&J-75; J&J-89; J&J-92; J&J-297; J&J-97; IMERYYS210810; J&J-303; J&J-141; J&J-246; IMERYYS 210707; J&J-164; J&J-341. (*filed under seal*)

51. Attached hereto as Exhibit 49 is a true and correct copy of IMERYYS 210707; J&J-169; J&J-175; J&J-305; J&J-179; J&J-177; JNJMX86_000013019; J&J-182; J&J-184; J&J-185; JNJ 000062176; J&J-190; J&J 0144301; JNJNL61_000006792; JNJ 000223449. (*filed under seal*)

52. Attached hereto as Exhibit 50 is a true and correct copy of J&J-0007797; J&J-0007801; JOJO-MA90013-0005; J&J 0007797; IMERYYS 238478;

IMERYS 238468; IMERYS 238457; IMERYS 211157; J&J-327; J&J-202;
IMERYS 219720; IMERYS 051370; IMERYS 238270; IMERYS 051442;
IMERYS 051436; IMERYS 442232; JNJ 000063951; JNJMX68_000004296;
IMERYS 548407. *(filed under seal)*

53. Attached hereto as Exhibit 51 is a true and correct copy of IMERYS
548366; IMERYS 189001; IMERYS 130504; IMERYS 130504; IMERYS 130504;
IMERYS 130504; IMERYS 499486; IMERYS 499264; JNJ 000375383; IMERYS
533753; IMERYS 533694. *(filed under seal)*

54. Attached hereto as Exhibit 52 is a true and correct copy of IMERYS
309326. *(filed under seal)*

55. Attached hereto as Exhibit 53 is a true and correct copy of IMERYS
081025. *(filed under seal)*

56. Attached hereto as Exhibit 54 is a true and correct copy of JNJ
000521616. *(filed under seal)*

57. Attached hereto as Exhibit 55 is a true and correct copy of IMERYS
210707. *(filed under seal)*

58. Attached hereto as Exhibit 56 is a true and correct copy of J&J 256.
(filed under seal)

59. Attached hereto as Exhibit 57 is a true and correct copy of JNJ
000245005. *(filed under seal)*

60. Attached hereto as Exhibit 58 is a true and correct copy of IMERYYS
210707. *(filed under seal)*

61. Attached hereto as Exhibit 59 is a true and correct copy of JNJ
000092227. *(filed under seal)*

62. Attached hereto as Exhibit 60 is a true and correct copy of JNJ
000085374. *(filed under seal)*

63. Attached hereto as Exhibit 61 is a true and correct copy of
JNJNL61_000000266. *(filed under seal)*

64. Attached hereto as Exhibit 62 is a true and correct copy of
JNJNL61_000001341. *(filed under seal)*

65. Attached hereto as Exhibit 63 is a true and correct copy of
JNJS71R_000001978; JNJ 000234805; JOJO-MA2330-0001;
JNJNL61_000024657; JNJNL61_000024650; JNJNL61_000032036;
JNJNL61_000023234; JNJ 000229914; JNJNL61_000024449; JNJ 000238826; JNJ
000248023; JNJ 000314680; JNJNL61_000025152; JNJS71R_000009825;
JNJS71R_000007083; JNJS71R_000000139; JNJ 000086280; JNJ 000232897;
JNJS71R_000002199; JNJ 000246844; JNJ 000346572; JNJ 000222851;
JNJ000252742; JNJS71R_000011316; JNJNL61_000064162;
JNJNL61_000064161; JNJNL61_000006591; JNJNL61_000043243;
JNJNL61_000043244; JNJNL61_000043245; JNJNL61_000043246;

JNJNL61_000006591; JNJNL61_000027053; JNJ 000065666; IMERYYS 210824;
JNJ 000346747; IMERYYS 210700; IMERYYS 210701; JNJNL61_000043271;
JNJNL61_000043272; JNJNL61_000006591; JNJ 000314406; IMERYYS 210810;
IMERYYS 210811; IMERYYS 210812; IMERYYS 210801; IMERYYS 210802;
IMERYYS 210803; IMERYYS 210794. (*filed under seal*)

66. Attached hereto as Exhibit 64 is a true and correct copy of IMERYYS
210788; IMERYYS 210789; IMERYYS 210790; IMERYYS 210791; IMERYYS 210792;
IMERYYS 210793; IMERYYS 210794; IMERYYS 210795; IMERYYS 210796;
IMERYYS 210797; IMERYYS 210798; IMERYYS 210799; IMERYYS 210758;
IMERYYS 210724. (*filed under seal*)

67. Attached hereto as Exhibit 65 is a true and correct copy of JNJ
000281919; JNJ 000281921; IMERYYS 477879. (*filed under seal*)

68. Attached hereto as Exhibit 66 is a true and correct copy of JNJ
000260807; JNJ 000269904. (*filed under seal*)

69. Attached hereto as Exhibit 67 is a true and correct copy of the First
Supplemental Rule 26 Expert Report of Dr. William E. Longo and Dr. Mark W.
Rigler, dated January 16, 2019.

70. Attached hereto as Exhibit 68 is a true and correct copy of Dr. William
E. Longo's curriculum vitae, dated November 22, 2017.

71. Attached hereto as Exhibit 69 is a true and correct copy of Dr. Mark W. Rigler's curriculum vitae, not dated.

72. Attached hereto as Exhibit 70 is a true and correct copy of the MDL Deposition of William E. Longo, Ph.D., dated February 5, 2019.

73. Attached hereto as Exhibit 71 is a true and correct copy of Dr. William E. Longo's, Dr. Mark W. Rigler's and MAS litigation testimony admissions history, dated March 27, 2019.

74. Attached hereto as Exhibit 72 is a true and correct copy of Dr. William E. Longo's testimony in *Herford v. AT&T Corp., et al.*, Superior Court of the State of California for the County of Los Angeles, JJCP 4674, Case No. BC646315, dated September 27, 2017.

75. Attached hereto as Exhibit 73 is a true and correct copy of Dr. William E. Longo's testimony in *Lanzo v. Cyprus Amex Minerals Co., Inc., et al.*, Superior Court of New Jersey Law Division, Middlesex County, Docket No. L-7385-16AS, dated December 22, 2017.

76. Attached hereto as Exhibit 74 is a true and correct copy of Dr. William E. Longo's testimony in *Anderson v. Borg-Warner Corporation by its Successor-in-Interest Borg-Warner Morse Tec, Inc., et al.*, Superior Court of the State of California, County of Los Angeles, JCCP No. 4674, Case No. BC666513, dated May 15, 2018.

77. Attached hereto as Exhibit 75 is a true and correct copy of Dr. William E. Longo's testimony in *Boyd-Bostic v. 3M Company, et al.*, State of South Carolina, County of Darlington, Court of Common Pleas, Case No. 2017-CP-16-0400, dated May 11, 2018.

78. Attached hereto as Exhibit 76 is a true and correct copy of Dr. William E. Longo's testimony in *Ingham v. Johnson & Johnson, et al.*, Circuit Court of the City of St. Louis, State of Missouri, Cause No. 1522-CC10417-01, dated June 7, 2018.

79. Attached hereto as Exhibit 77 is a true and correct copy of Dr. William E. Longo's testimony in *Ingham v. Johnson & Johnson, et al.*, Circuit Court of the City of St. Louis, State of Missouri, Cause No. 1522-CC10417-01, dated May 29, 2018.

80. Attached hereto as Exhibit 78 is a true and correct copy of Dr. William E. Longo's testimony in *Henry v. Brenntag North America, Inc., et al.*, Superior Court of New Jersey Law Division, Middlesex County, Docket No. MID-1784-17AS, dated September 14, 2018.

81. Attached hereto as Exhibit 79 is a true and correct copy of Dr. William E. Longo's testimony in *Allen v. Brenntag North America, Inc.*, Superior Court of the State of California, Case. DR 180132, dated October 17, 2018.

82. Attached hereto as Exhibit 80 is a true and correct copy of Dr. William E. Longo's testimony in *Leavitt v. Johnson & Johnson, et al.*, Superior Court of the State of California, County of Alameda, RG17882401, dated February 7, 2019.

83. Attached hereto as Exhibit 81, is a true and correct copy of Dr. William E. Longo's testimony in *Olson v. Brenntag North America, Inc., et al.*, Supreme Court of the State of New York, dated February 25, 2019.

84. Attached hereto as Exhibit 82 is a true and correct copy of Dr. William E. Longo's testimony in *Rimondi v. BASF Catalysts LLC, et al.*, Superior Court of New Jersey, Middlesex County, Docket No. MID-2912-17AS, dated March 5, 2019.

85. Attached hereto as Exhibit 83 is a true and correct copy of Dr. William E. Longo's testimony in *Schmitz v. Johnson & Johnson, et al.*, Superior Court of the State of California, County of Alameda, No. RG18923615, dated April 30, 2019.

86. Attached hereto as Exhibit 84 is a true and correct copy of Dr. William E. Longo's testimony in *Sizemore v. Bowater Paper Mill, et al.*, State of South Carolina, County of Hampton, Court of Common Please, 2016-CP-25-00440, dated May 7, 2019.

87. Attached hereto as Exhibit 85 is a true and correct copy of Tersigni Certification, Exhibit E16, May 7, 2019.

88. Attached hereto as Exhibit 86 is a true and correct copy the MDL Deposition of Dr. Mark Rigler, dated February 6, 2019.

89. Attached hereto as Exhibit 87 is a true and correct copy of Dr. Mark's Rigler's Affidavit, dated May 21, 2018.

90. Attached hereto as Exhibit 88 is a true and correct copy of Dr. William E. Longo's Certification, dated July 3, 2018.

91. Attached hereto as Exhibit 89 is a true and correct copy of U.S. Geological Survey, Tabulation of Asbestos-Related Terminology, dated 2002.

92. Attached hereto as Exhibit 90 is a true and correct copy of Dr. William E. Longo's and Dr. Rigler's 2nd Supplemental MDL Report, dated February 1, 2019.

93. Attached hereto as Exhibit 91 is a true and correct copy of the Transcript of Deposition of Melinda Darby Dyar, Ph.D, dated April 2, 2019.

94. Attached hereto as Exhibit 92 is a true and correct copy of the EPA Response to R.J. Lee, dated April 20, 2006.

95. Attached hereto as Exhibit 93 is a true and correct copy of Federal Register, 30 CFR Parts 56, 57, and 71, Asbestos Exposure Limit: Final Rule, dated February 29, 2008.

96. Attached hereto as Exhibit 94 is a true and correct copy of the J&J Memo "Audit Testing of Windsor 66 Talc for Asbestos," dated June 28, 1977.

97. Attached hereto as Exhibit 95 is a true and correct copy of "Analysis of Powdered Talc For Asbestiform Minerals by Transmission Electron Microscopy."

98. Attached hereto as Exhibit 96 is a true and correct copy of “Analysis of Powdered Talc for Asbestiform Minerals by Transmission Electron Microscopy,” dated March 21, 1995.

99. Attached hereto as Exhibit 97 is a true and correct copy of ISO 22262-1, Sampling and Qualitative Determination of Asbestos in Commercial Bulk Materials (2012).

100. Attached hereto as Exhibit 98 is a true and correct copy of SEM Photomicrographs of 1978 JJ Museum Sample along with presentation by RJ Lee regarding asbestiform v. non-asbestiform for comparison.

101. Attached hereto as Exhibit 99 is a true and correct copy of Colorado School of Mines “A Procedure to Examine Talc for the Presence of Chrysotile and Tremolite-Actinolite Fibers” dated December 27, 1973.

102. Attached hereto as Exhibit 100 is a true and correct copy of Internal J&J Memo “Proposed Specs for Analyzing Talc for Asbestos” dated May 22, 1973.

103. Attached hereto as Exhibit 101 is a true and correct copy of J&J Memo “We have deliberately not included a concentration technique...” dated February 18, 1975.

104. Attached hereto as Exhibit 102 is a true and correct copy of Internal J&J Memo “Review of CTFA Methodology for the Detection of Asbestos in Talc, as well as, Comments on TPF Methodology” dated February 28, 1975.

105. Attached hereto as Exhibit 103 is a true and correct copy of CTFA J4-1 method.

106. Attached hereto as Exhibit 104 is a true and correct copy of Memo to CTFA Estrin from J&J, dated December 17, 1974.

107. Attached hereto as Exhibit 105 is a true and correct copy of Internal J&J Memo Ashton to Lee, dated November 24, 1976.

108. Attached hereto as Exhibit 106 is a true and correct copy of JNJ-1550 at 4; JNJ-058; JNJ-1228; JNJ-121. (*filed under seal*)

109. Attached hereto as Exhibit 107 is a true and correct copy of excerpts from the Transcript of Deposition of Mickey E. Gunter, Ph.D., dated September 8, 2017.

110. Attached hereto as Exhibit 108 is a true and correct copy of the Transcript of Deposition of Brooke T. Mossman, M.S., Ph.D., Leavitt Trial, dated November 15, 2018.

111. Attached hereto as Exhibit 109 is a true and correct copy of the Yamate Paper.

112. Attached hereto as Exhibit 110 is a true and correct copy of the Expert Report of Melinda Darby Dyar, Ph.D.

113. Attached hereto as Exhibit 111 is a true and correct copy of the Transcript of Deposition of Gregory B. Diette, MD, dated April 4, 2019.

114. Attached hereto as Exhibit 112 is a true and correct copy of Reid, A., N. de Klerk, and A. W. Musk. “Does Exposure to Asbestos Cause Ovarian Cancer? A Systematic Literature Review and Meta-Analysis.” *Cancer Epidemiology Biomarkers & Prevention* 20, no. 7 (July 1, 2011).

115. Attached hereto as Exhibit 113 is a true and correct copy of Heller, D. S., et al. “Asbestos Exposure and Ovarian Fiber Burden.” *American Journal of Industrial Medicine* 29, no. 5 (May 1996).

116. Attached hereto as Exhibit 114 is a true and correct copy of Camargo, et al., “Occupational Exposure to Asbestos and Ovarian Cancer: A Meta-Analysis.” *Environmental Health Perspectives* 119, no. 9 (September 2011).

117. Attached hereto as Exhibit 115 is a true and correct copy of Mossman, Brooke T. 2018. “Mechanistic in Vitro Studies: What They Have Told Us about Carcinogenic Properties of Elongated Mineral Particles (EMPs).” *Toxicology and Applied Pharmacology*, July.

118. Attached hereto as Exhibit 116 is a true and correct copy of the Transcript of Deposition of Joshua E. Muscat, Ph.D., dated September 25, 2018.

119. Attached hereto as Exhibit 117 is a true and correct copy of Michael Huncharek, et al., Use of Cosmetic Talc on Contraceptive Diaphragms and Risk of Ovarian Cancer: a Meta-Analysis of Nine Observational Studies, 16 *Eur. J. Cancer Prev.* 422 (2007).

120. Attached hereto as Exhibit 118 is a true and correct copy of Michael Huncharek & Joshua Muscat, *Perineal Talc Use and Ovarian Cancer Risk: a Case Study of Scientific Standards in Environmental Epidemiology*, Eur. J. Cancer Prevention (2011).

121. Attached hereto as Exhibit 119 is a true and correct copy of the Transcript of Deposition of Mark Krekeler, Ph.D., dated January 25, 2019.

122. Attached hereto as Exhibit 120 is a true and correct copy of the Transcript of Deposition of Robert Cook, Ph.D., dated January 30, 2019.

123. Attached hereto as Exhibit 121 is a true and correct copy of IMERYS 441340. *(filed under seal)*

124. Attached hereto as Exhibit 122 is a true and correct copy of IMERYS 427326. *(filed under seal)*

125. Attached hereto as Exhibit 123 is a true and correct copy of IMERYS 427419. *(filed under seal)*

126. Attached hereto as Exhibit 124 is a true and correct copy of IMERYS 436951. *(filed under seal)*

127. Attached hereto as Exhibit 125 is a true and correct copy of IMERYS 427428. *(filed under seal)*

128. Attached hereto as Exhibit 126 is a true and correct copy of IMERYS 418940. *(filed under seal)*

129. Attached hereto as Exhibit 127 is a true and correct copy of
Pltf_IMERYYS_00057875. *(filed under seal)*

130. Attached hereto as Exhibit 128 is a true and correct copy of IMERYYS
501902. *(filed under seal)*

131. Attached hereto as Exhibit 129 is a true and correct copy of IMERYYS
238270. *(filed under seal)*

132. Attached hereto as Exhibit 130 is a true and correct copy of IMERYYS
418940. *(filed under seal)*

133. Attached hereto as Exhibit 131 is a true and correct copy of IMERYYS
425354. *(filed under seal)*

134. Attached hereto as Exhibit 132 is a true and correct copy of IMERYYS
427291. *(filed under seal)*

135. Attached hereto as Exhibit 133 is a true and correct copy of IMERYYS
427326. *(filed under seal)*

136. Attached hereto as Exhibit 134 is a true and correct copy of IMERYYS
435992. *(filed under seal)*

137. Attached hereto as Exhibit 135 is a true and correct copy of IMERYYS
436000. *(filed under seal)*

138. Attached hereto as Exhibit 136 is a true and correct copy of JNJ
000238826. *(filed under seal)*

139. Attached hereto as Exhibit 137 is a true and correct copy of JNJ
000248023. (*filed under seal*)

140. Attached hereto as Exhibit 138 is a true and correct copy of JNJ
000322351. (*filed under seal*)

141. I certify that the foregoing statements made by me are true. I am aware
that if any of the foregoing statements made by me are willfully false, I may be
subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: May 29, 2019